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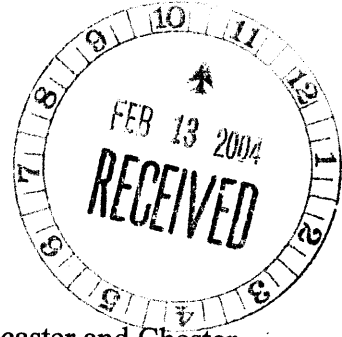
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February 5, 2004

Mr. Troy Brady
Surface Transportation Board
Case Control Unit
1925 K Street, N.W.
Washington, D.C. 20423



Re: Consolidated Rail Corporation-Abandonment Exemption-In Lancaster and Chester Counties, STB Docket No. AB-167 (Sub-No 1095X)

Dear Mr. Brady:

Please find enclosed for filing an original and two copies of the Comments of Lancaster County for filing in the above captioned proceeding in response to the Board's request. I also enclose an additional copy for time-stamping purposes. I request that this copy be time-stamped and returned to me in the enclosed self-addressed envelope. Should you have any questions or comments please do not hesitate to contact my office.

Sincerely,

STEVENS & LEE


Kenneth Zielonis

Philadelphia • Reading • Valley Forge • Lehigh Valley • Harrisburg • Lancaster
Scranton • Wilkes-Barre • Princeton, NJ* • Cherry Hill, NJ* • Wilmington, DE

BEFORE THE
SURFACE TRANSPORTATION BOARD

CONSOLIDATED RAIL
CORPORATION
ABANDONMENT EXEMPTION
IN LANCASTER COUNTY AND
CHESTER COUNTY, PA.

STB DOCKET NO. AB-167
(Sub-No. 1095x)



COMMENTS OF LANCASTER COUNTY

1. By letter dated January 5, 2004, the Surface Transportation Board's (hereinafter the "STB"), Section of Environmental Analysis (hereinafter the "SEA"), issued an invitation to Lancaster County (hereinafter the "County"), to become a consulting party in the SEA's National Historic Preservation Act Section 106 process. The Section 106 process consists of an historic review of structures that may be impacted by federal action and a determination of mitigation actions for those structures considered historically significant. The County appreciates this invitation and wishes to become a consulting party. As the SEA is aware, earlier in this proceeding the County expressed an interest in public use of the Enola Low Grade line corridor. The County has a renewed interest in this property and will work with the parties in this proceeding.

2. The Section 106 contact persons for the County are as follows:

Technical: James L. Hackett, Executive Director
Lancaster County Department of Parks and Recreation
1050 Rockford Road
Lancaster, PA 17602
Telephone: (717) 299-8215
Facsimile: (717) 295-5942

Legal: Kenneth Zielonis, Esq.
STEVENS & LEE
4750 Lindle Road
Harrisburg, PA. 17111
Telephone: (717) 564-5278
Facsimile: (610) 371-7375

3. The composition of the County Board of Commissioners has changed since the Section 106 process was reinitiated by the SEA. The County is now seriously interested in available public uses, (including the possibility of a trail), for the Enola Low Grade corridor. The County has begun the process of reviewing and analyzing possible uses for the line including preservation of the corridor. Depending upon the specific public use selected and implemented, achievement of this goal may moot the need to complete the Section 106 process. The County has begun the process to reach out to the local communities affected by the Enola Low Grade line to ensure a collaborative resolution is achieved.

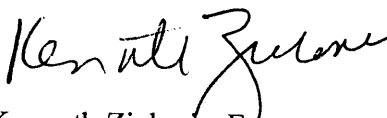
4. The County agrees with the Pennsylvania State Historic Preservation Officer's (hereinafter "SHPO"), position that resolution of this proceeding through a trail, or some other appropriate public use, may moot the need to complete the Section 106 process. The County wishes to work towards that goal.

5. The Enola Low Grade line offers a unique natural resource to the County and the Commonwealth of Pennsylvania. The diversity of resources along the corridor is unique in Lancaster County and unparalleled in the Commonwealth of Pennsylvania. As such, the County wishes to explore preservation of the corridor.

6. The County is encouraged that Norfolk Southern has indicated it would seriously consider any proposal for trail use as long as the proposal meets certain conditions palatable to Norfolk Southern, Pennsylvania Lines, Inc., the Consolidated Rail Corporation and certain affected parties, namely the affected local municipalities and state agencies. The County is also sensitive to the desire of all parties and the STB to resolve this matter in a timely fashion. The County is rapidly coming up to speed on the corridor and has established an internal working group to examine the matter. Obviously, all of this takes time; the County, however, is committed to a timely resolution consistent with its obligation to ensure the matter is thoroughly examined so as to protect all parties' interests. The County will work towards presentation of a reasonable and specific proposal.

7. In the interim, the County will work with the other consulting parties to develop a list of representative structures to be documented. The County will review Norfolk Southern's documentation of the structures as well as its archival research to ensure compliance with Pennsylvania state standards as required by the proposed Memorandum of Agreement. The County anticipates cooperation among the parties so that this matter can be resolved timely.

Respectfully submitted,



Kenneth Zielons, Esq.
STEVENS & LEE
4750 Lindle Road
Harrisburg, PA. 17111
Telephone: (717) 564-5278
Facsimile: (610) 371-7375

Dated: February 5, 2004

BEFORE THE
SURFACE TRANSPORTATION BOARD

CONSOLIDATED RAIL
CORPORATION
ABANDONMENT EXEMPTION
IN LANCASTER COUNTY AND
CHESTER COUNTY, PA.

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CERTIFICATE OF SERVICE

I, Kenneth Zielonis, Esq., do hereby certify that on this 5th day of February 2004,

I have caused a true and correct copy of Lancaster County's Comments in the above-referenced matter, to be served on the following, by first-class mail, postage prepaid, addressed as follows:

The Honorable Arlen Specter
United States Senate
Harrisburg Regional Office
P.O. Box 1092
Harrisburg, PA 17108

The Honorable Joseph R. Pitts
Member of Congress
50 North Duke Street
Lancaster, PA 17602

James R. Paschall
General Attorney
Norfolk Southern Corporation
Three Commercial Place
Norfolk, VA 23510-2191

Mr. Don L. Klima, Director
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue NW, Suite 809
Old Post Office Building
Washington, DC 20004

Ms. Susan Zacker
Pennsylvania Historical & Museum
Commission
Bureau for Historic Preservation
400 North Street, 2nd Floor
Harrisburg, PA 17120-0093

Joyce A. Nettke
Friends of the Atglen-Susquehanna Trail, Inc.
P.O. Box 27
Strasburg, PA 17579